

ADDENDUM TO THE FACT SHEET
FOR NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM (NPDES)
PERMIT NO. WA0001864

I. GENERAL INFORMATION

Facility: Concrete Technology Corporation
1123 Port of Tacoma Road
Tacoma, WA 98421

II. APPLICATION REVIEW

Concrete Technology Corporation (CTC) submitted an application to the Department of Ecology (Ecology) on January 2, 2008, for permit reissuance, and Ecology accepted it on February 27, 2008. Ecology has sufficiently reviewed the application, discharge monitoring reports, and other facility information in enough detail to ensure that:

- CTC has, for the most part, complied with all of the terms, conditions, requirements and schedules of compliance of the expired permit.
- Ecology has up-to date information on CTC's waste treatment practices, the facility's production levels; and the nature, content, volume, and frequency of its discharge.
- The discharge normally meets applicable effluent standards and limits, water quality standards, and other legally applicable requirements.

III. PERMIT REAUTHORIZATION

When Ecology reauthorizes a discharge permit it essentially reissues the permit with the existing limits, terms and conditions. Alternatively, when Ecology renews a permit it re-evaluates the impact of the discharge on the receiving water which may lead to changes in the limits, terms and conditions of the permit.

This fact sheet addendum accompanies the permit, which Ecology proposes to reauthorize for the discharge of wastewater to the Blair Waterway, of Inner Commencement Bay (Tacoma, WA). The previous fact sheet and statement of basis for the permit modification explains the basis for the discharge limitations and conditions of the reauthorized permit and remains as part of the administrative record.

Ecology determined it does not need to change the existing modified permit requirements, including discharge limits and monitoring, to protect the receiving water receiving quality. The previous fact sheet addressed conditions and issues at the facility at the time when Ecology issued the previous permit in 2004. Since the issuance of the current permit, Ecology has modified the permit to allow CTC to utilize their graving dock for potential shipyard related projects. The permit modification was issued December 1, 2008. Ecology has not received any additional information since the modification which indicates that environmental impacts from the discharge warrant a complete renewal of the modified permit. The reauthorized permit is virtually identical to the previously modified permit.

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Ecology reviewed inspections and assessed compliance of the CTC's discharge with the terms and conditions in the previous permit and determined that it should not rank the facility as a high priority for permit renewal. Ecology assigns a high priority for permit renewals in situations where water quality would benefit from a more stringent permit during the next five-year cycle.

The permit reauthorization process, along with the renewal of high priority permits, allows Ecology to reissue permits in a timely manner and minimize the number of active permits that have passed their expiration dates. For permit reissuance planning purposes, Ecology follows a system of ranking that considers the benefit gained by renewing a permit rather than reauthorizing a permit during its annual permit planning process. Ecology assesses each permit that is expiring and due for reissuance and compares it with other permits due for reissuance. Ecology notifies the public and seeks input after it has tentatively established the initial draft ranking of the permits it plans to renew and those it plans to reauthorize. Ecology considers all relevant comments and suggestions before it makes a final decision.

Ecology carried over the discharge limits and conditions in effect at the time of expiration of the previous permit to this reauthorized permit. Ecology only changed the submittal dates for reports from those in the previous permit. Ecology removed the completed report requirements that do not require additional or continued assessment. It adjusted the dates for the other standard compliance and submittal requirements that it carried over from the past permit into this reauthorized permit. Ecology considered these reports necessary in the previous permit and no information has come forward to cause it to reconsider.

Ecology must public notice the availability of the draft reauthorized permit at least 30 days before it reissues the permit [Washington Administrative Code (WAC) 173-220-050]. Ecology invites you to review and comment on its decision to reauthorize the permit (see Appendix A-Public Involvement for more detail on the Public Notice procedures).

After the public comment period has closed, Ecology will prepare a response to comments document that it will attach to this fact sheet addendum. The response to comments will include the resultant changes to the permit and either address each comment individually or summarize the substantive comments and respond. Ecology sends a copy of the response to comments to all parties who submitted comments. Ecology will include the response to comments in this fact sheet addendum.

IV. RECOMMENDATION FOR PERMIT ISSUANCE

Ecology proposes to reissue this permit for five years.

APPENDIX A--PUBLIC INVOLVEMENT INFORMATION

Ecology proposes to reissue a permit to Concrete Technology Corporation. The permit includes wastewater discharge limits and other conditions. This fact sheet addendum describes the facility and Ecology's reasons for reauthorizing the permit conditions.

Ecology placed a Public Notice of Application on June 9, 2008, and June 16, 2008 in the *Tacoma News Tribune* to inform the public about the submitted application and to invite comment on the reissuance of this permit.

Ecology will place a Public Notice of Draft on January 9, 2009, in the *Tacoma News Tribune* to inform the public and to invite comment on the proposed draft National Pollutant Discharge Elimination System permit and fact sheet addendum.

The Notice –

- Tells where copies of the draft Permit and Fact Sheet are available for public evaluation(a local public library, the closest Regional or Field Office, posted on our website.).
- Offers to provide the documents in an alternate format to accommodate special needs.
- Urges people to submit their comments, in writing, before the end of the Comment Period
- Tells how to request a public hearing of comments about the proposed NPDES Permit.
- Explains the next step(s) in the permitting process.

Ecology has published a document entitled **Frequently Asked Questions about Effective Public Commenting** which is available on our website at <http://www.ecy.wa.gov/biblio/0307023.html>.

You may obtain further information from Ecology by telephone, 360-407-6280, or by writing to the permit writer at the address listed below.

Industrial Unit Permit Coordinator
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, Washington 98504-7775

The primary author of this permit and fact sheet is John Diamant.

RESPONSE TO COMMENTS

Comments regarding Concrete Technology Corporation's (CTC's) draft NPDES Permit were received on January 14, 2009, from the Washington State Department of Natural Resources (DNR). DNR's comments and Ecology's responses are provided below as follows:

Comment No.1:

DNR welcomes the new NPDES permit.

Response No. 1:

Ecology welcomes any comments from anyone during the Public Review and Commenting Period.

Comment No 2:

Ecology should promote and insist on the reuse of wastewater for industries discharging to this receiving water. Ecology acknowledges that reuse would require "some capital investment" suggesting that it would be an appropriate requirement. Ecology also notes that it "may not be reasonable to impose as AKART." For those receiving waters experiencing heavy loadings small additional loadings should be discouraged. A schedule leading to full reuse of water would be appropriate.

Response No 2:

Ecology encourages reuse of wastewater for all industries whenever it is feasible. CTC also recognizes this and strives to minimize waste whenever possible. Control over the quality of water reused may be limited to interference or residual effects of certain admixtures. This would be undesirable for a nationally recognized manufacturer of concrete products.

Ecology believes CTC is currently utilizing AKART to treat the pollutants of concern from the concrete production from this facility: pH and turbidity. Ecology will continue to evaluate the performance of this facility to control pollutants, compliance with water quality standards, and whether AKART is being met.

Comment No. 3:

Inspections of stormwater facilities must be increased. The Fact Sheet notes that the facility was last inspected in 1998. – more than ten years ago. Presumably any stormwater prevention plan has not been reevaluated since that time.

Response No. 3:

Ecology has conducted more recent inspections of the facility. Since 1998, Ecology's records show this facility has been inspected in: July 2001, November 2002, January 2004, June 2005, December 2006, and February 2009.

Please note that the permit has been reauthorized, a process which allows Ecology to renew a permit with little, or no, changes. The reauthorization process allows Ecology to reuse the Fact Sheet which was originally issued with the original permit. This allows Ecology to focus on more critical issues/permits which require significantly more time.

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Inspection reports for CTC are available for review at Ecology by request. Please contact Ecology's public disclosure officer (currently, Debbie Nelson at 360-407-6365) for more information or to set up an appointment.

Comment No. 4:

The data used to determine the limits are based upon old data – 1996 through 1999. Surely more recent data are available.

Response No. 4:

Ecology has current data for CTC as required by the conditions of CTC's NPDES Permit. Please note that the permit has been reauthorized, a process which allows Ecology to renew a permit with little, or no, changes. The reauthorization process allows Ecology to reuse the Fact Sheet which was originally issued with the original permit. This allows Ecology to focus on more critical issues/permits which require significantly more time.

Current CTC monitoring data is available for review at Ecology by request. Please contact Ecology's public disclosure officer (currently, Debbie Nelson at (360) 407-6365) for more information or to set up an appointment.

Comment No. 5:

The documentation for the pH mixing zone is weak. Stating that it is "more complex" is inadequate.

Response No. 5:

No mixing zones, for any pollutant, have been explicitly authorized to this facility at this time. The facility has the right to propose to conduct a Mixing Zone Study for future consideration for obtaining a mixing zone. Please note Special Condition S1.F of the permit states this fact.

Ecology has searched the Fact Sheet and have not been able to find the words "more complex." Therefore, Ecology is uncertain what this reference is for. Please refer to the last paragraph on Page 6 of the Fact Sheet for a description of how the pH limitations were defined.